

**Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233**

I submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233.

I am very concerned that a number of proposals discussed in the NPRM would violate the First Amendment rights of radio stations. As a result, First Amendment Rights of listeners would also be violated in the way these proposals will limit people's ability to choose what they want to listen to. Therefore, these proposals must not be adopted.

(1) The NPRM's proposal to require advisory boards would require force radio stations to take advice from people who do not share their values. This would make some broadcasters, particularly religious broadcasters, vulnerable to attack from those who oppose their message. The freedom to share ideas from various points of view is very important in a free society like ours. It is also a freedom that is protected by our constitution.

(2) While some radio stations may exist as public forums, the FCC must not turn every radio station into a public forum where anyone and everyone has rights to air time, as proposed public access requirements would require. Religious broadcasters must not be required to broadcast messages that they conscientiously object to.

(3) The FCC must not force revelation of specific editorial decision-making information. Having to disclose this information would make religious broadcasters unnecessarily vulnerable to attacks from those who oppose them and the programs they air.

(4) The FCC must not establish dual renewal systems in which certain licensees would be automatically barred from routine renewal application processing. The proposed mandatory special renewal review of certain classes of applicants by the Commissioners themselves would amount to coercion of religious broadcasters. Those who stay true to their consciences and present only the messages they correspond to their beliefs could face long, expensive and potentially ruinous renewal proceedings.

(5) In our society, it is important that people at the grass roots level continue to be able to have a voice, and to be heard. Many broadcasters, both religious and secular, operate on very tight budgets. Paying the bills is often a challenge. These broadcasters may serve small niches or smaller communities. Their future would be endangered by Commission proposals that would substantially raise broadcasting costs in two ways: (a) by requiring staff presence whenever a station is on the air and, (b) by further restricting main studio location choices.

I urge the FCC not to adopt rules, procedures or policies discussed above.

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